



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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July 8, 2015

Also Sent Via Email

Mat Cusma P.E.
Environmental Administrator
Schnitzer Steel Industries
3200 NW Yeon Avenue
Portland, OR 97210

RE: DEQ Comments for March 11, 2015 *Dust Monitoring Results January 2015 Monitoring Event Burgard Industrial Park-SSI Area*
ECSI #2355

Dear Mr. Cusma:

Enclosed are DEQ's comments for the dust monitoring results from the four sampling events collected during July, August, October 2014, and January 2015 at Schnitzer Steel (SSI).

Review Comments

1. Page 3, Dust Monitoring Results

DEQ disagrees that the relative dust measured at targeted activities compared to background stations A1 and P8 indicate that offsite sources likely contribute to dust measured on the SSI site. The comparison of relative dust measurements does not take into account the source of dust and onsite control efforts (material wetting). The wind directions observed during the monitoring events often does not reflect the sample distribution. Stations A1 and P8 often have a dust flux direction in contrast to prevailing wind. Stations A1 and P8 have likely dust sources from surface dust on the roadway. It is likely that Station P8 dust levels are from track off of dust from Schnitzer Steel and other industrial park traffic.

2. Page 4, Conclusions of Overall Dust Monitoring Program

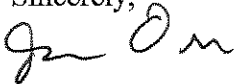
The July and August dust sampling indicated significant dust was measured on the SSI facility source areas and dust detections on the border of the Willamette River and Industrial Slip from site activities. The longer collection period and relatively dry conditions produced significantly more dust on the sample media than the October 2014 and January 2015 events.

The statement that "dust levels in the overall Burgard Industrial Park appear to be primarily caused by other sources than SSI activities" is not supported by the dust monitoring. DEQ agrees that Stations A1 and P8 have sources that are from the roadway track off and off site conditions but a comparison of Schnitzer source area and onsite dust measurements is not relative to the offsite samples, as discussed in Comment #1.

DEQ requests that four additional four day duration dust monitoring events be performed in July, August, October, and January. This information will be used to confirm that site controls are effective and refine the current dust transport conceptual model. Additional monitoring events will be considered after evaluation of the additional dust monitoring and comparison to previous dust data.

If this dust sampling plan is acceptable, then confirm with DEQ. Please call me at (503) 229-5039, if you have questions regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jim Orr', is written over the word 'Sincerely,'.

Jim Orr, R.G.
Project Manager
DEQ NW Region Cleanup Section

cc: ECSI File 2355
Mark Bartee, Schnitzer Steel Industries
Scott Sloan, Schnitzer Steel Industries
Ross Rieke, Bridgewater Group
Matt McClincy, DEQ NWR
Alex Liverman, DEQ NWR
Eva DeMaria, EPA-(Electronic Distribution Only)
Sean Sheldrake, EPA-(Electronic Distribution Only)